

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA**

In re: MASTER LENDING GROUP, LLC,

Debtor

Case No. 23-40569

Chapter 7

PRUCO LIFE INSURANCE COMPANY,

Plaintiff,

v.

JUDITH HIRSCH, individually, and  
TIFFANY CARON, solely in her capacity as  
Chapter 7 Trustee for the bankruptcy estate of  
Master Lending Group, LLC,

Defendants.

Adversary No. 23-04021-EJC

**PRUCO LIFE INSURANCE COMPANY’S MOTION TO APPEAR BY PHONE OR VIA  
ZOOM AT THE STATUS CONFERENCE OF MARCH 6, 2024**

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This Honorable Court recently issued a *Notice of Status Conference* for a hearing to be held on March 6, 2024 at 10:00 a.m. at the Savannah Annex, in the 2<sup>nd</sup> Floor Hearing Room. Pruco Life Insurance Company (hereinafter Pruco) is a neutral stakeholder in this Adversary Interpleader action. As a mere stakeholder, Pruco has no interest in the Remaining Death

Benefit, and Pruco has represented and continues to represent that it is ready, willing, and hereby offers to deposit the Remaining Death Benefit together with applicable interest, if any, into the Court, or with a person duly authorized by the Court to receive it.

Pruco's attorney resides in Atlanta, Georgia and if required to appear in-person at the Status Conference on March 6, 2024, would be required to drive to Status Conference the day before and stay overnight in Savannah, Georgia.

In this matter, Pruco is seeking the entry of an Order awarding Pruco payment of its reasonable attorney's fees and costs necessitated by the bringing of this action. As a general principle, attorney's fees are justified in interpleader actions. *Kawasaki Kisen Kaisha, Ltd. v. All City Used Auto Parts, Inc.*, 306 F. App'x 480, 482 (11th Cir. 2009) referencing *Chase Manhattan Bank v. Mandalay Shores Coop. Hous. Ass'n (In re Mandalay Shores Coop. Hous. Ass'n)*, 21 F.3d 380, 382-83, 8 Fla. L. Weekly Fed. C 205 (11th Cir. 1994). See also *Prudential Ins. Co. v. Boyd*, 781 F.2d 1494, 1497 (11th Cir.1986) holding that "[i]t is axiomatic that an award of attorneys' fees and costs in an interpleader action in bankruptcy is an equitable matter that lies within the sound discretion of the bankruptcy court."

As Pruco is a mere stakeholder and has requested that its fees and expenses be awarded in this action, Pruco is mindful to keep any attorney's fees and expenses incurred to a bare minimum.

WHEREFORE, Pruco respectfully requests that its attorney, Ellen L. Ash, Esq., be permitted to attend the Status Conference on March 6, 2024 by phone or via Zoom Conference.

Submitted this 16<sup>th</sup> day of February, 2024.

By: /s/ Ellen L. Ash

ELLEN L. ASH

Georgia Bar No. 289670

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**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA**

In re: MASTER LENDING GROUP, LLC,  Debtor.	Case No. 23-40569  Chapter 7  Adv. Proc. No. 23-04021-EJC
PRUCO LIFE INSURANCE COMPANY,  Plaintiff,  v.  JUDITH HIRSCH, individually, and TIFFANY CARON, solely in her capacity as Chapter 7 Trustee for the bankruptcy estate of Master Lending Group, LLC,  Defendants.	<b>ANSWER TO JUDITH HIRSCH'S CLAIM FOR FUNDS AND COUNTERCLAIM AGAINST PRUCO LIFE INSURANCE COMPANY FOR INTEREST</b>

I certify that the foregoing *Pruco Life Insurance Company's Motion to Appear by Phone or Via Zoom at the Status Conference of March 6, 2024* was electronically filed using the Bankruptcy Court's Electronic Case Filing program which sends a notice of and an accompanying link to the Document under the Bankruptcy Court's Electronic Case Filing program as follows:

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This 16<sup>th</sup> day of February, 2024

By: /s/ Ellen L. Ash  
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